

United States District Court
Eastern District of Michigan
Southern Division

United States of America,

Case No. 2:13-cv-12585

Plaintiff,

v.

Honorable Robert H. Cleland

Eighty Three Thousand Six
Hundred Forty Dollars (\$83,640)
in U.S. Currency, et al.,

Defendants *In Rem*.

STIPULATION AND ORDER TO STAY
CIVIL FORFEITURE PROCEEDING

Plaintiff, the United States of America, by and through Acting United States Attorney Daniel L. Lemisch, and Assistant United States Attorney Philip A. Ross, and Claimants, Will Justice and Hilda Rudder-Justice, by and through their attorney, Raymond R. Burkett, (collectively, “the Parties”), hereby acknowledge that there is an ongoing criminal proceeding related to this civil forfeiture case, U.S. vs. Will Justice, (Case No. 17-cr-20180), *assigned to* Honorable Stephen J. Murphy, III. Plaintiff filed a Forfeiture Bill of Particulars in the criminal proceeding which incorporates the same assets listed in this civil forfeiture proceeding.

The Parties agree to the entry of an order for a stay of the above-captioned civil forfeiture proceeding pursuant to 18 U.S.C. § 981(g)(1), or alternatively, 18 U.S.C. § 981(g)(2), on the grounds that continuation of the civil proceeding may negatively impact one or more Parties in the manner described in the cited statutes; and that the stay continue during the pendency of the related criminal proceeding, or until further order of the Court.

The Parties further agree that after the stay is lifted, the Parties shall file dispositive motions, if any, prior to any pretrial or trial proceedings.

The United States further agrees that it will respond to Claimants' Discovery Request(s) sent to the United States on or about May 10, 2017, after the stay is lifted in this civil forfeiture proceeding.

Approved as to substance and form:

DANIEL L. LEMISCH
Acting United States Attorney

/s/Philip A. Ross
PHILIP A. ROSS
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Dated: June 2, 2017

/s/Raymond R. Burkett (with consent)
RAYMOND R. BURKETT, Esq.
Attorney for Claimants Will Justice
and Hilda-Rudder Justice
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[P-30155]
Dated: June 2, 2017

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ORDER TO STAY
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IT IS SO ORDERED.

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: June 9, 2017

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, June 9, 2017, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(810) 292-6522